

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

MDL No. 3076

Case No. 1:23-md-03076-KMM

IN RE:

FTX Cryptocurrency Exchange Collapse Litigation

This document relates to:

Multinational VC Defendants

O'Keefe v. Sequoia Capital Operations, LLC, et al., S.D. Fla.
Case No. 1:23-cv-20700

O'Keefe v. Temasek Holdings (Private) Ltd., et al., N.D. Cal.
Case No. 3:23-cv-3655

Chernyavsky et al. v. Temasek Holdings (Private) Ltd., et al.,
S.D. Fla. Case No. 1:23-cv-22960

Cabo et al. v. Temasek Holdings (Private) Ltd. et al., N.D. Cal.
Case No. 3:23-cv-03974

**UNOPPOSED MOTION TO EXTEND REPLY BRIEFING DEADLINE ON
PLAINTIFFS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINT AGAINST
MULTINATIONAL VC DEFENDANTS**

Plaintiffs respectfully file this unopposed motion seeking an order from this Court extending by one week the deadline for their reply brief in support of their Motion and Incorporated Memorandum for Leave to File Amended Complaint Against Multinational VC Defendants (ECF No. 493) (“Motion for Leave to Amend”). Plaintiffs have conferred with counsel for Multinational VC Defendants Temasek Holdings (Private) Limited (“Temasek Holdings”), Temasek International (USA) LLC (“Temasek USA,” and, collectively with Temasek Holdings, “Temasek”), Sino Global Capital Limited (“SGCL”), Sino Global Capital Holdings, LLC (“SGCH,” and, collectively with SGCL, “Sino Global”), Softbank Group Corp., SB Group US, Inc., and SoftBank Investment Advisers (UK) Limited, and SoftBank Global Advisers Limited (collectively, “SoftBank”), who all indicated that they do not oppose Plaintiffs’ request to extend their Reply deadline from March 22, 2024 to March 29, 2024.

1. On February 16, 2024, Plaintiffs filed a Motion for Leave to Amend and attached their proposed amended complaint. *See* R. Doc. 493.

2. On February 21, 2024, Sino Global Capital Limited filed three Rule 12 motions to dismiss (R. Docs. 497, 498, 499) (“Motions to Dismiss”) Plaintiffs’ Administrative Class Action Complaint against the Multinational VC Defendants (R. Doc. 182).

3. Plaintiffs and Multinational VC Defendants conferred regarding a briefing schedule covering Plaintiffs’ Motion for Leave to Amend and SGCL’s Motions to Dismiss. The parties reached an agreement whereby the parties’ opposition deadlines related to Plaintiffs’ Motion for Leave to Amend and SGCL’s Motions to Dismiss would be extended by fourteen days to March 15, 2024 and March 20, 2024, respectively. During these discussions, Plaintiffs and Multinational VC Defendants further agreed to grant the other a one-week extension of their respective reply deadlines in support of the Motion for Leave to Amend and Motions to Dismiss should the parties desire to file a reply brief.

4. The parties filed a joint motion seeking an order from this Court approving the agreed briefing schedule, which this Court granted on March 5, 2024. ECF Nos. 508, 514. The motion and order did not address the parties’ reply brief deadlines.

5. Having received Multinational VC Defendants' opposition to their Motion for Leave to Amend, Plaintiffs now seek an order from this Court extending the March 22, 2024 deadline for their reply brief by one week in accordance with the parties' agreement, making such reply due on or before March 29, 2024. Multinational VC Defendants have agreed to this requested relief.

WHEREFORE, Plaintiffs pray that the Court grant their Unopposed Motion to Extend Reply Briefing Deadline on Plaintiffs' Motion for Leave to File Amended Complaint Against Multinational VC Defendants and extend such deadline to March 29, 2024.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1 (a)(3)

In compliance with Local Rule 7.1(a)(3), Plaintiffs' counsel conferred via email on February 29, 2024, with counsel for Temasek, Sino Global Capital, and SoftBank regarding whether they would oppose the relief requested herein. Counsel for all parties indicated that they did not oppose the extension requested herein.

Dated: March 19, 2024

Respectfully submitted,

By: /s/ Adam Moskowitz

Adam M. Moskowitz
Florida Bar No. 984280
Joseph M. Kaye
Florida Bar No. 117520
THE MOSKOWITZ LAW FIRM, PLLC
Continental Plaza
3250 Mary Street, Suite 202
Coconut Grove, FL 33133
Office: (305) 740-1423
adam@moskowitz-law.com
joseph@moskowitz-law.com
service@moskowitz-law.com

Co-Lead Counsel

By: /s/ David Boies

David Boies
Alexander Boies
Brooke A. Alexander
BOIES SCHILLER FLEXNER LLP
333 Main Street
Armonk, NY 10504
914-749-8200
dboies@bsfllp.com
aboies@bsfllp.com
balexander@bsfllp.com

Co-Lead Counsel

Joseph R. Saveri
Christopher Young
Itak K. Moradi
JOSEPH SAVERI LAW FIRM
601 California Street, Suite 1000
San Francisco, CA 94108
Telephone: (415) 500-6800
jsaveri@saverilawfirm.com
cyoung@saverilawfirm.com
imoradi@saverilawfirm.com

*Counsel to Plaintiffs and the Putative
Classes*

James R. Swanson, La. Bar No. 18455
Kerry J. Miller, La. Bar. No. 24562
Molly L. Wells, La. Bar. No. 36721
C. Hogan Paschal, La. Bar No. 38495
FISHMAN HAYGOOD L.L.P.
201 St. Charles Avenue, 46th Floor
New Orleans, Louisiana 70170-4600
(504) 586-5252; (504) 586-5250 fax
jswanson@fishmanhaygood.com
kmiller@fishmanhaygood.com
mwells@fishmanhaygood.com
hпасchal@fishmanhaygood.com

Robert Lieff
P.O. Drawer A
Rutherford, CA 94573
rlieff@lieff.com

*Counsel to Plaintiffs and the Putative
Classes*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed on March 19, 2024 via the Court's CM/ECF system, which will send notification of such filing to all attorneys of record.

By: /s/ Adam Moskowitz
Adam M. Moskowitz